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April 23, 2021

Via ECF Filing

The Honorable Ramon E. Reyes, Jr.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Kaikov v. Kaikov, et. al.*, Case No. 19-cv-2521- LDH-RER
Joint Motion to Extend Discovery Deadlines

Dear Judge Reyes:

I am counsel for Plaintiff in the above-referenced matter. I am writing on behalf of all parties to jointly respectfully request the Court to extend the deposition discovery deadline by 60 days from April 30, 2021 to June 30, 2021 and well as extend expert discovery deadlines accordingly for the reasons set forth below.

This is a third request for extension of the depositions discovery deadline. There are no set deadlines other than a scheduled pre-trial conference in this matter set for August 6, 2021.

On February 26, 2021, the Court issued a minute order extending time to complete discovery until April 30, 2021.

To date, the parties have completed a number of depositions of Plaintiff, Defendant, and third-party witnesses.

Several depositions still remain outstanding. First, as discussed with the Court during April 14, 2021 hearing, after completing Plaintiff's deposition, Defendant requested to depose several witnesses who reside in Russia. Plaintiff's counsel is attempting to reach the witnesses and determine whether they will agree to appear voluntarily and needs some additional time to determine that. Second, deposition of Defendant's wife, non-party Ms. Ovcharenko, scheduled for February 25, 2021, had to be rescheduled due to her illness and technical issues with the internet in her residence. She can be available during the first week of May when Plaintiff plans to schedule her deposition. Third, there is an outstanding motion related to production of documents from Defendants' Accountant (Objection to the Decision Denying Defendant's Motion to Quash the Subpoena, Docket No. 67). Plaintiff has also recently received documents from the bank account of TNR Renovations, Inc. – a contractor performed "renovations" on

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the Investment Properties (Docket No. 83). While plaintiff has subpoenaed both witnesses to also appear for a deposition, it would make sense to hold the depositions once there is a ruling on the document requests.

Finally, Plaintiff respectfully requests a 60-day extension of discovery deadline for expert report, which is currently due on June 30, 2021. The expert who is expected to calculate Plaintiff's damages related to the Investment Properties will need to review documents from TNR Renovations as well as documents from the Defendants' accountant (e.g. profit and loss statements, tax returns) in order to prepare the report. Defendants do not object to this request.

Accordingly, the parties jointly request that the discovery deadline be extended until June 30, 2021 and the expert discovery deadlines be extended as follows:

Plaintiff's expert report	August 31, 2021
Defendants' Counter	September 30, 2021
Expert Depositions	November 30, 2021.

We thank the Court for its time and effort in consideration of this matter.

Respectfully submitted,

/s/ Maria Temkin

Maria Temkin, Esq.

For: TEMKIN & ASSOCIATES, LLC

MT

Cc: All counsel of record (via ECF System)